

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TARIQ BHATTI	)	
	)	
Plaintiff,	)	C.A. No.: 05-690 (KAJ)
	)	
	)	
v.	)	TRIAL BY JURY DEMANDED
	)	
J.P. MORGAN CHASE, a Delaware	)	
Corporation,	)	
	)	
Defendant.	)	

TO: Teresa A. Cheek, Esquire  
Young, Conaway, Stargatt & Taylor  
1000 West Street, 17<sup>th</sup> Floor  
P.O. Box 391  
Wilmington, DE 19899

**NOTICE OF 30 (b)(6) DEPOSITION DUCES TECUM\***

**PLEASE TAKE NOTICE**, that pursuant to the provisions of Rule 30(b)(6),  
Federal Rules of Civil Procedure, the defendants, are to designate the appropriate  
personnel most knowledgeable to testify as to all reasons why the plaintiff was not  
accepted in his application for job requisition numbers 30013375 and 40012913 for a  
deposition to be taken on August 29, 2007 beginning at 9:00 a.m. at the offices of Aber,  
Goldlust, Baker & Over, Suite 600, First Federal Plaza, 702 King Street, Wilmington, DE  
19801.

\*The designated witness shall bring with him/her all documents relevant to, pertaining  
to, or mentioning the referenced job requisitions, the applicants for such positions,  
and/or documents relating to the factual basis for not awarding the position to the  
plaintiff.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber.  
GARY W. ABER (DSB #754)  
First Federal Plaza, Suite 600  
702 King Street, P.O. Box 1675  
Wilmington, DE 19899  
302-472-4900  
Attorney for Plaintiff

DATED: July 26, 2007

**CERTIFICATE OF SERVICE**

This certifies that the undersigned served two copies of the attached pleadings by hand delivery to the below-named Counsel, on July 26, 2007:

Teresa A. Cheek, Esquire  
Young, Conaway, Stargatt & Taylor  
1000 West Street, 17<sup>th</sup> Floor  
P.O. Box 391  
Wilmington, DE 19899

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/s/ Melissa A. Chionchio  
Melissa A. Chionchio  
Secretary to  
Gary W. Aber, Esquire